

INTEROFFICE CORRESPONDENCE

DATE: October 7, 1994

TO: Distribution

FROM: *MCB* M. C. Broussard, Environmental Operations Management, Bldg. 080, x8517

SUBJECT: GRADED APPROACH READINESS ASSESSMENT, TRENCHING ACTIVITY FOR
SYSTEMATIC EVALUATION PROGRAM (SEP) GEOLOGICAL EXCAVATION/SEISMIC
INVESTIGATION- MCB-259-94

DOE Order: 5481.1B

Action: Return signatures to D. S. Brown by close-of-business Monday, October 10, 1994.

The purpose of this memo is to meet the requirements of 2-G21-ER-ADM-18.03, Environmental Restoration Program Division (ERPD) Readiness Assessments (RAs). This procedure allows for a graded approach to RAs on the basis of an activity's hazards, risks, and complexity.

An RA is required for this activity because the activity is to be conducted in the Buffer Zone, the operational responsibility for which resides with Environmental Operations Management (EOM). EOM believes that the attached memorandum of understanding (MOU) meets the intent of the ERPD RA procedure. This MOU has been reviewed by all concurreurs.

Please indicate your receipt and acceptance of this MOU by your signature (concurrence or approval, as indicated). Please return the signed memorandum to D. S. Brown, Building 080, x8745, fax 8556, by close-of-business Monday, October 10, 1994.

DSB DSB:bk

Attachment:
As Stated

Distribution

K. D. Anderson
F. M. Badwan
D. S. Brown
E. S. Chandler
N. S. Demos
R. E. Kell

R. S. Luker
A. J. Saunders
S. G. Stiger

cc:
G. W. Coles
L. A. Gregory-Frost
F. C. Grigsby
E. A. Keil
L. J. McGovern

T. H. McVicar
N. L. Montgomery
M. B. Murdock
W. L. Peregoy
D. P. Snyder
ERPD Records (2)

DOCUMENT CLASSIFICATION:
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD
BZ-A-00226

MEMORANDUM OF UNDERSTANDING
Between
ENVIRONMENTAL RESTORATION PROGRAM DIVISION
and
ENGINEERING AND SAFETY SERVICES / SYSTEMATIC EVALUATION PROGRAM
GRADED APPROACH READINESS ASSESSMENT
for
TRENCHING ACTIVITY FOR SYSTEMATIC EVALUATION PROGRAM (SEP) GEOLOGICAL
EXCAVATION/SEISMIC INVESTIGATION

- 1) The subject activities are entirely funded and managed by Engineering and Safety Services (E&SS)/ Systematic Evaluation Program (SEP).
- 2) These activities encompass the completion of one to three trenches within a defined area within the RFETS Buffer Zone (BZ), north-northeast of Operable Unit 7. Trench dimensions will be approximately 4 feet wide, 25 feet deep, and 200 to 500 feet long. The trench(es) will be as defined in the applicable and approved Soil Disturbance Permit and Addendum, as (originally) issued under Charge Number 99007.

If the proposed location for the trench(es) is changed from that in the referenced Permit and Addendum, an additional Addendum to the Permit will be generated and approved, prior to commencement of work, to address new concerns, if any.

- 3) These activities have been reviewed by ERPD/Historical Release Reporting (HRR). Determinations prior to the start of activities indicate that they will not generate any hazardous waste per 40 CFR Part 261.22 . . . 261.30.

SEP has designated T. H. McVicar, E&SS/SEP, as the Qualified Hazardous Waste Generator for these activities. He is responsible for making any required (real-time) hazardous waste determinations, using all available process knowledge for these activities. If, at any time, it is determined that a hazardous waste has been or will be generated during, SEP accepts full responsibility for all aspects of containerization and proper management under RCRA, including all costs associated therewith.

- 4) These activities will be conducted in accordance with the requirements of the Integrated Work Control Program (IWCP), as described in Work Package No. TR078899. Work will not commence until the Work Package has been approved by the Environmental Restoration Program Division (ERPD)/Environmental Operations Manager.
- 5) There are no ERPD personnel, or personnel subcontracted by ERPD, assigned to these activities on either a management, supervisory, or field basis with the exception that ERPD Geosciences will be granted access to the trench(es) for the purposes of geological mapping.
- 6) These activities do not affect ERPD/Quality Assurance (QA) requirements and approval by ERPD/QA is hereby waived.

FINAL

24

- 7) ERPD has no knowledge of and makes no representation regarding the status of the training and qualification requirements identified for these activities as detailed in D. G. Breen, ltr DGB-158-94, to W. L. Peregoy, August 24, 1994. E&SS/SEP assumes all responsibility for compliance by all involved personnel with all applicable requirements.
- 9) These activities have been evaluated by RFETS Health and Safety (H&S) and by ERPD/H&S. These disciplines are satisfied that the activities will be managed in a manner consistent applicable with OSHA, RCRA, and RFETS requirements. SEP accepts responsibility for ensuring proper H&S oversight for these activities.

A pre-evolutionary briefing, including relevant site and task specific H&S issues (especially confined space entry), will be conducted prior to the initiation of the activity. The SEP project manager will forward a copy of the pre-evolutionary agenda and roster to the ERPD RA Coordinator immediately upon completion of the briefing. (Roster(s) must include all affected personnel, whether EG&G or subcontracted.)

- 1 0) These activities have been evaluated by RFETS Ecology and Watershed Management. SEP acknowledges the conditions of Ecology and Watershed Management approval of these activities as stated in M. B. Murdock, ltr MBM-013-94, to T. H. McVicar, October 4, 1994.
- 1 1) These activities have been granted a Categorical Exclusion, RFFO/CX24-94, September 12, 1994. SEP acknowledges the work scope issues as outlined in the "Commitments and Contingency Planning" portion of the Section D Determination document.
- 1 2) These activities will be placed on the EOM Plan-of-the Day agenda upon ERPD/EOM authorization (operations authorization) to proceed with the work as planned.

APPROVED:

151 R. E. KELL
R. E. Kell, Director, E&SS

10-10-94
Date

S. G. Stiger
S. G. Stiger, Director, ERPD

10-11-94
Date

CONCURRENCE:

K. D. Anderson
K. D. Anderson, ERPD/Health and Safety

10/10/94
Date

151 FARIS BADWAN
F. M. Badwan, Manager, Systematic Evaluation Program

10/10/94
Date

M. C. Broussard
M. C. Broussard, ERPD/Environmental Operations Manager

10-7-94
Date

D. S. Brown
D. S. Brown, ERPD/RA Coordinator

10-7-94
Date

151 E. S. CHANDLER
E. S. Chandler, RFETS Occupational Safety

10-10-94
Date

N. S. Demos
N. S. Demos, ERPD/HRR

10/10/94
Date

R. S. Luker
R. S. Luker, ERPD/Quality Assurance Program Manager

10-7-94
Date

A. J. Saunders
A. J. Saunders, ERPD/IWCP

10-10-94
Date

FINAL